

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

TYRONE J. THOMPSON, on Behalf of
Himself and All Others Similarly
Situating,

Plaintiff,

v.

ANADARKO E&P ONSHORE, LLC;
ANADARKO PETROLEUM
CORPORATION; ANADARKO E&P
COMPANY, L.P. MITSUI E&P USA,
LLC; and STATOIL USA ONSHORE
PROPERTIES, INC.

Defendants.

Civ. Action No. 4:17-cv-00557-MEM

Electronically Filed

**STIPULATION AND [PROPOSED] ORDER FOR A STAY OF
PROCEEDINGS**

WHEREAS, Plaintiff filed his Complaint in the above-referenced action on
March 30, 2017 (ECF No. 1);

WHEREAS, Defendant Statoil USA Onshore Properties Inc. (“Statoil”) signed a waiver of service of summons that was filed with the Court on May 9, 2017 (ECF No. 8);

WHEREAS, the waiver of service of summons extended Statoil’s deadline to respond to Plaintiff’s Complaint to June 20, 2017;

WHEREAS, the parties stipulated to an extension of time, to August 21, 2017, for Statoil to respond to Plaintiff's Complaint, which the Court approved and ordered on June 20, 2017 (ECF No. 24);

WHEREAS, Plaintiff and certain other defendants have agreed to a stay to consider and discuss potential options for resolution of the claims presented in this case, and Statoil wishes to remain on the same schedule as the other defendants;

Accordingly, the parties hereby stipulate to a stay of this case, with the parties to provide a status report to the Court by November 15, 2017.

Signed and stipulated this 18th day of August, 2017.

/s/ Charles E. Schaffer

Charles E. Schaffer (PA Bar No. 76259)
LEVIN SEDRAN & BERMAN
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500
Facsimile: (215) 592-4663
cschaffer@lfsblaw.com

Michelle R. O'Brien (PA Bar No.
90470)
THE O'BRIEN LAW GROUP LLC
4099 Bimey Avenue
Moosic, PA 18507
Telephone: (570) 209-7901
Facsimile: (570) 309-0147
mobrien@theobrienlawgroup.com

Larry D. Moffett (Pro Hac Vice to Be
Submitted)
DANIEL COKER HORTON & BELL,
P.A.
265 North Lamar Boulevard, Suite R
P.O. Box 1396
Oxford, MS 38655
Telephone: (662) 232-8979
Facsimile: (662) 232-8940
lmoffett@danielcoker.com

John W. ("Don") Barrett (Pro Hac Vice to Be Submitted)
BARRETT LAW GROUP
Post Office Drawer 927
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662) 834-2628
dbarrett@barrettlawgroup.com

Charles J. LaDuca (Pro Hac Vice to Be Submitted)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Avenue NW
Suite 200
Washington, D.C. 20016
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
charles@cuneolaw.com

David S. Stellings (Pro Hac Vice to Be Submitted)
Daniel Seltz (Pro Hac Vice to Be Submitted)
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592
dstellings@lchb.com
dseltz@lchb.com

Alexandra C. Warren (PA Bar No. 93651)
CUNEO GILBERT & LADUCA, LLP
507 C Street, NE
Washington, DC 20002
Tel: (202) 789-3960
Fax: (202) 789-1813
awarren@cuneolaw.com

Attorneys for Plaintiff and All Others Similarly Situated

/s/ Ryan A. Shores

Ryan A. Shores (DC 500031, admitted
pro hac vice)

David A. Higbee (DC 500605, admitted
pro hac vice)

SHEARMAN & STERLING LLP

401 9th Street, NW Suite 800

Washington, DC 20004-2128

202-508-8000 (phone)

202-508-8100 (fax)

ryan.shores@shearman.com

John G. Dean (Pa Bar No. 76168)

ELLIOTT GREENLEAF & DEAN

39 Public Square, Suite 1000

Wilkes-Barre, PA 18701

(570) 371-5290

jgd@elliottgreenleaf.com

*Attorneys for Defendant Statoil USA
Onshore Properties Inc.*

SO ORDERED.

Dated: _____

U.S. District Judge Malachy E. Mannion